

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

MOFET ETZION, LTD.,

Plaintiff,

vs.

GENERAL DYNAMICS LAND  
SYSTEMS, INC.,

Defendant.

Civil Action No. 07 CIV 4566 (LAP)

**NOTICE OF MOTION FOR  
ADMISSION *PRO HAC VICE* OF  
RICHARD T. FRANCH**

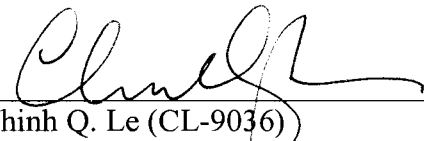
PLEASE TAKE NOTICE, that upon the declaration of Chinh Q. Le, Esq., Defendant General Dynamics Land Systems, Inc., by its attorneys Jenner & Block LLP, respectfully moves the Court, pursuant to Local Rule 1.3(c), for an Order allowing the admission *pro hac vice* of Richard T. Franch, Esq., Jenner & Block LLP, 330 N. Wabash Avenue, Chicago, IL 60611-7603, (312) 840-8640, (312) 840-8740 (facsimile), for the pendency of the above-captioned case or further order of this Court. There are no pending disciplinary proceedings against Richard T. Franch in any State or Federal court. A proposed order is submitted with this motion.

Dated: June 12, 2007

Respectfully,

JENNER & BLOCK LLP

By:

  
Chinh Q. Le (CL-9036)  
919 Third Avenue  
37th Floor  
New York, New York 10022  
(212) 891-1600  
(212) 891-1699

*Attorneys for Defendant*

**CERTIFICATE OF SERVICE**

I, Chinh Le, an attorney, hereby certify that on June 12, 2007 I caused true and correct copies of the foregoing ***Motion for Admission Pro Hac Vice*** and supporting documents to be served on the following individuals via USPS first class mail:

**Jeffrey Bialos**

Sutherland Asbill & Brennan LLP  
1275 Pennsylvania Avenue NW  
Washington, DC 20004  
(202)383-0100  
Fax: (202)383-3593

**John L. North**

Sutherland Asbill & Brennan LLP  
1275 Pennsylvania Avenue, NW  
Washington, DC 20004  
(202)383-0100  
Fax: (202)383-3593

**Lawrence Andrew Dany, III**

Sutherland Asbil & Brennan, LLP (NYC)  
1114 Avenue of the Americas  
40th Flr.  
New York, NY 10036  
(212)389-5000  
Fax: (212)389-5099

*Attorneys for Plaintiff.*

  
Chinh Q. Le

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MOFET ETZION, LTD.,	)	
	)	
Plaintiff,	)	Civil Action No. 07 CIV 4566 (LAP)
	)	
vs.	)	<b>DECLARATION OF CHINH Q. LE IN</b>
	)	<b>SUPPORT OF MOTION FOR</b>
GENERAL DYNAMICS LAND	)	<b>ADMISSION <i>PRO HAC VICE</i> OF</b>
SYSTEMS, INC.,	)	<b>RICHARD T. FRANCH</b>
	)	
Defendant.	)	
	)	

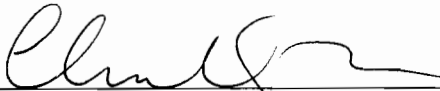
I, CHINH Q. LE, declare as follows:

1. I am a member in good standing of the bar of this Court.
2. This declaration is made in support of Defendant General Dynamics Land Systems, Inc.'s motion seeking admission *pro hac vice* of Richard T. Franch pursuant to Local Rule 1.3(c) of the United States District Court for the Southern District of New York.
3. Richard T. Franch is a partner in the firm of Jenner & Block LLP, 330 N. Wabash Ave., Chicago, Illinois, 60611 and has been practicing law since 1967. He is a member in good standing with the bar of the State of Illinois. *See* Certificate of Good Standing attached as Exhibit A to the Declaration of Richard T. Franch in Support of Motion for Admission *Pro Hac Vice*.
4. He has advised me that he is familiar with the Federal Rules of Civil Procedure and with the Local Rules of this Court.
5. There are no disciplinary proceedings currently pending against Mr. Franch in any state or federal court.
6. I believe Mr. Franch will conduct himself in the manner required of attorneys that practice in, and are admitted to, this Court, and therefore I respectfully request that he be

admitted *pro hac vice* for the purpose of representing General Dynamics Land Systems, Inc. during the pendency of this action or on further order of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: June 12, 2007

  
\_\_\_\_\_  
CHINH Q. LE (CL-9036)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MOFET ETZION, LTD.,	)	
	)	
Plaintiff,	)	Civil Action No. 07 CIV 4566 (LAP)
	)	
vs.	)	<b>DECLARATION OF RICHARD T.</b>
	)	<b>FRANCH IN SUPPORT OF MOTION</b>
GENERAL DYNAMICS LAND	)	<b>FOR ADMISSION <i>PRO HAC VICE</i></b>
SYSTEMS, INC.,	)	
	)	
Defendant.	)	
	)	

I, RICHARD T. FRANCH, declare as follows:

1. I am a resident of Illinois and have been a practicing attorney in the State of Illinois since 1967. I am a partner with the law firm of Jenner & Block LLP, which maintains an office at 330 N. Wabash Avenue, Chicago, Illinois 60611-7603.

2. I make this declaration in support of my application for admission *pro hac vice* to the bar of the United States District Court for the Southern District of New York to serve as counsel for Defendant, General Dynamics Land Systems, Inc. ("GDLS"), in the above-captioned matter. My admission *pro hac vice* will serve GDLS' interests, and will facilitate the efficient litigation of this matter, given my firm's representation of GDLS on this matter to date.

3. I was admitted to practice before the courts in the following jurisdictions on the dates set forth below:

- a. State of Illinois Supreme Court (November 7, 1967);
- b. U.S. District Court for the Northern District of Illinois (December 13, 1967);
- c. U.S. Court of Appeals for the Seventh Circuit (June 9, 1971);
- d. Supreme Court of the United States (January 7, 1980);

- e. U.S. Court of Appeals for the Eighth Circuit (June 23, 1981);
- f. U.S. Court of Appeals for the Third Circuit (November 4, 1981);
- g. U.S. Court of Appeals for the Second Circuit (May 22, 1984);
- h. U.S. District Court for the Eastern District of Wisconsin (February 7, 1989);
- i. U.S. Court of Appeals for the Sixth Circuit (February 25, 1991);
- j. U.S. Tax Court (#FR 0549) (September 19, 1994);
- k. U.S. Court of Appeals for the Ninth Circuit (September 11, 1997);
- l. U.S. Court of Appeals for the Fourth Circuit (August 1, 2003).

4. I am a member in good standing of the foregoing bars, and I have never been disbarred or suspended. Moreover, there are no disciplinary proceedings pending against me. A true and correct copy of my Certificate of Good Standing issued by the Supreme Court of Illinois is attached at Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: June 11, 2007

A handwritten signature in black ink, appearing to read 'Richard T. Franch', written over a horizontal line.

Richard T. Franch

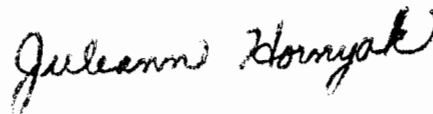
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Richard T. Franch

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 7, 1967 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Friday, June 01, 2007.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MOFET ETZION, LTD.,	)	
	)	
Plaintiff,	)	Civil Action No. 07 CIV 4566 (LAP)
	)	
vs.	)	<b>[PROPOSED] ORDER GRANTING</b>
	)	<b>ADMISSION <i>PRO HAC VICE</i></b>
GENERAL DYNAMICS LAND	)	
SYSTEMS, INC.,	)	
	)	
Defendant.	)	
	)	

The motion for admission of Counsel *pro hac vice* in this matter having come before and been considered by the Court, and the Court being satisfied that Richard T. Franch, Esq., is licensed and admitted to practice law and a member in good standing of the Bar of the State of Illinois, it is hereby

ORDERED that the Motion for Admission *Pro Hac Vice* of Richard T. Franch, Esq., is GRANTED and Richard T. Franch is admitted to the Bar of this Court *pro hac vice* as counsel for Defendant.

Dated: June 12, 2007

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UNITED STATES DISTRICT JUDGE